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and Sony Music Entertainment (Japan) Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re DMCA Subpoena to _____) Case No: 3:23-mc-80302
)
Cloudflare, Inc.) **DECLARATION OF HIROYUKI**
) **NAKAJIMA**
)

I, Hiroyuki Nakajima, declare and testify as follows:

1. I am an attorney duly licensed to practice law in Japan. I represent Bandai Namco Music Live Inc. (“BNML”) and Sony Music Entertainment (Japan) Inc. (“Sony”), both Japanese corporations, in the above-entitled proceeding and as such, I am authorized and qualified to make this declaration for and on their behalf, and I make this declaration for that reason.

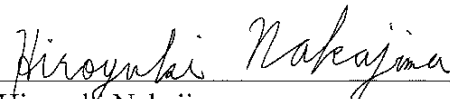
2. BNML and Sony are seeking a subpoena pursuant to 17 U.S.C. § 512(h) to obtain information sufficient to identify the persons infringing their copyrighted works.

3. The purpose for which this subpoena is sought is to obtain the identity of the alleged infringers. Such information will only be used for the purpose of protecting rights under the Copyright Act (17 U.S.C. § 101, et seq.).

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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

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4 Executed on November 14, 2023.

5
6 
7 Hiroyuki Nakajima